

**IN THE UNITED STATES COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**INTERNATIONAL ASSOCIATION OF)
MACHINISTS AND AEROSPACE)
WORKERS, LOCAL LODGE 1632,)**

Plaintiff,

vs.

PEMCO WORLD AIR SERVICES, INC,))

Defendant.)

Civil Action No. 1:07-cv-174-WKW

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P.27(f), a meeting was held on May 8, 2007 and was attended by Patrick K. Nakamura, Esq. on behalf of Plaintiff and by Stephen E. Brown, Esq. on behalf of Defendant.

2. **PRE-DISCOVERY DISCLOSURES**

The Parties will exchange by July 6, 2007 the information required by Rule 26.1(a)(1).

3. **DISCOVERY PLAN**

The parties jointly propose to the Court the following discovery plan:

a. Discovery will be needed on the subjects of Plaintiff's claims of breach of contract and failure to comply with arbitration award, and defendant's defenses and issues related to both.

b. All discovery commenced in time to be completed by February 22, 2008.

c. Maximum of 30 interrogatories, 30 requests for production and 30 requests for admissions by each party to any other party.

Responses due 30 days after service.

d. Maximum of 5 depositions by Plaintiff(s) and 5 by Defendant(s). Each deposition limited to a maximum of seven (7) hours unless extended by agreement of the parties.

e. Reports from retained experts under Rule 27(a)(2) due:

from Plaintiff(s) by December 7, 2007.

from Defendant(s) by January 18, 2008.

f. Supplementation under Rule 26 due as soon as known and no later than February 1, 2008.

4. **OTHER ITEMS**

a. The Parties do not request a conference with the Court before entry of the scheduling order.

b. Plaintiff(s) should be allowed until August 17, 2007 to join additional parties and to amend the pleadings.

c. Defendant(s) should be allowed until September 21, 2007 to join additional parties and to amend the pleadings.

d. All potentially dispositive motions should be filed by 90 days prior to the Pretrial Conference..

e. Settlement cannot be realistically evaluated prior to October 31, 2007.

f. The Parties request a final pretrial conference in or after April, 2008.

g. Final lists of trial evidence under Rule 26(a)(3) should be due:
from Plaintiff(s): witnesses by 30 days prior to trial; exhibits by 30 days prior to trial; deposition excerpts by 30 days prior to trial.

from Defendant(s): witnesses by 30 days prior to trial; exhibits by 30 days prior to trial; deposition excerpts by 30 days prior to trial.

h. Parties should have 15 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).

i. The case should be ready for trial by May 19, 2008 and at this time is expected to take approximately 1-2 days.

5. Permission is expressly granted to Defendant's counsel by Plaintiff's counsel to affix his electronic signature hereto and electronically file this pleading.

Date: May 9, 2007

s/ Patrick K. Nakamura
Counsel for Plaintiff

s/ Stephen E. Brown
Counsel for Defendant

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